

APPENDIX B

United States Department of Energy Pollution Prevention Strategy
 Issued by Secretary O'Leary to all Department Elements on December 27, 1994

POLICY STATEMENT:

"The Department of Energy (DOE) embraces pollution prevention as its strategy to reduce the generation of all waste streams and thus minimize the impact of departmental operations on the environment, as well as improving safety of operations and energy efficiencies. I expect the Department to continue the leadership shown by our voluntary compliance with the Emergency Planning and Community Right-to-Know Act (EPCRA) and our participation in the Environmental Protection Agency's 33/50 program which focuses on near-term pollution prevention efforts of 17 priority toxic chemicals.

...Recognizing that pollution prevention is the Department's preferred approach to meeting its environmental responsibilities, I am directing that Cognizant Secretarial Offices, working in conjunction with the Pollution Prevention Executive Board, identify, plan, and allocate funds for field implementation of waste minimization and pollution prevention activities during the departmental budget review process. This information will be used to provide an identified budget each year dedicated to pollution prevention activities."

Secretary Hazel R. O'Leary,
 December 28, 1993

RESPONSIBLE INDIVIDUAL:

DOE is committed to ensuring the success of its pollution prevention goals. Because of this commitment, the Department has designated the Deputy Secretary of Energy as the senior manager responsible for coordination of the Department's efforts in pollution prevention. The Deputy Secretary may designate another individual to act on his behalf should the need arise.

BACKGROUND:

The Department of Energy has had a long-standing commitment to implementing the principles contained in Executive Order 12856, "Federal Compliance with Right-to-Know Laws and Pollution Prevention Requirements." DOE facilities have been active in complying with EPCRA since its passage in 1986. The Department has provided guidance and training materials on the general requirements of EPCRA, and specific guidance and training on Toxics Release Inventory (TRI) reporting. In fact, the Department has led the Federal sector in TRI reporting by voluntarily committing to report TRI releases prior to the issuance of the Executive Order, and has worked closely with EPA during 1992 and 1993 on resolving issues of Federal facility TRI reporting.

The Department has also been a leader in the development and implementation of pollution prevention programs and activities, including voluntary participation in EPA's 33/50 program. In 1988, 12 DOE facilities filed Form R reports with EPA as sites which used or stored chemicals to be reported under TRI. Since then, DOE facilities have met, ahead of schedule, the Department's goal of a 50 percent reduction in TRI releases and transfers of the seventeen priority toxic chemicals covered by the EPA 33/50 program. In addition, facility-specific pollution prevention plans are required under DOE Order 5400.1, General Environmental Protection Program, and the Department has issued guidance to its facilities on the preparation of those plans. DOE has actively involved nearly all Departmental organizations in pollution prevention activities at the staff level through the Waste Reduction Steering Committee, and at the senior management level through the Pollution Prevention Executive Board, chaired by the Deputy Secretary of Energy.

The combined effort of these groups produced the Department's 1994 Waste Minimization/Pollution Prevention Program Plan, as well as a program to identify and implement pollution prevention projects which can produce successful results in the near-term. In addition, the Department has established a pollution prevention funding mechanism through the Department-wide Environment, Safety and Health Management Plan. This will ensure that pollution prevention programs are funded that reduce toxic emissions and waste generation in a cost effective manner.

Every effort has been, and will continue to be, made to involve the public and other stakeholders in monitoring the Department's progress in meeting the requirements of Executive Order 12856.

The attached bibliography details past Departmental efforts to implement pollution prevention through Secretarial memoranda, guidance documents, and planning documents. The objectives and goals which follow build upon the previous efforts and upon the Department's other pollution prevention successes to date.

OBJECTIVE 1: EFFECTIVELY INSTITUTIONALIZE THE POLLUTION PREVENTION ETHIC THROUGH TRAINING AND AWARENESS IN ALL MISSION AREAS

DOE OFFICES OF RESPONSIBILITY: All Cognizant Secretarial Offices

Sub-objective 1.1

Develop an environmentally aware DOE community through education and training in pollution prevention so that all personnel understand the DOE commitment to utilize pollution prevention through source reduction, where practicable, as the primary means of achieving and maintaining compliance with all applicable Federal, State, and local environmental regulations.

- Equip our work force with the pollution prevention skills to accomplish DOE's missions while protecting the environment.
- Institutionalize and continually improve appropriate pollution prevention training for our personnel.
- Integrate pollution prevention measures into all operations.

Sub-objective 1.2

Promote pollution prevention through multimedia outreach/awareness programs and partnerships.

- Strengthen working relationships with regulators at all levels.
- Foster partnerships with stakeholders and industry by:
 - participating in local community emergency planning;
 - enhancing the coordination and effectiveness of local emergency response capabilities;
 - providing communities with information on toxic chemical use and release by reporting under TRI;
 - promoting the elimination of the use of hazardous substances, a reduction in toxic emissions, and a reduction in the generation of hazardous waste and DOE facilities; and

- encouraging affirmative procurement of non hazardous chemicals and materials and products with recycled content, and the reuse and recycling of materials when possible.
- Demonstrate innovative leadership in and commitment to pollution prevention.
- Disseminate information on pollution prevention technologies throughout the DOE complex.
- Work with other Federal agencies on information exchange.

Sub-objective 1.3

Encourage and recognize outstanding pollution prevention efforts through existing and new awards/incentive programs.

OBJECTIVE 2: REDUCE RELEASES AND OFF-SITE TRANSFERS OF TOXIC CHEMICALS TO THE ENVIRONMENT

DOE OFFICES OF RESPONSIBILITY: All Cognizant Secretarial Offices

Sub-objective 2.1

Minimize releases of toxic chemicals to the environment and off-site transfers of such toxic chemicals. To the maximum extent possible, such reductions shall be achieved through source reduction.

GOAL:

By December 31, 1999, achieve a Department-wide 50 percent reduction of total releases of toxic chemicals to the environment and off-site transfers of such toxic chemicals from the baseline year

(DOE will determine the baseline year after further study).

Sub-objective 2.2

Establish site-specific goals to reduce the generation and use of radioactive and other hazardous materials to the extent practicable.

Sub-objective 2.3

Develop, maintain, and implement pollution prevention plans at each major facility. These plans may include baselines, pollution prevention opportunity assessments, and investment strategies.

Sub-objective 2.4

Implement cost-effective pollution prevention at all DOE facilities.

Sub-objective 2.5

Submit annual reports to the EPA Administrator regarding progress made toward achievement of the above goal, as well as progress made in complying with all other aspects of Executive Order 12856.

OBJECTIVE 3: INCORPORATE POLLUTION PREVENTION POLICY INTO THE ACQUISITION PROCESS

DOE OFFICES OF RESPONSIBILITY: All Cognizant Secretarial Offices

Sub-objective 3.1

Integrate environmental considerations into acquisition strategies, plans, and the source selection process. Employ life cycle analyses and total cost accounting principles in procurements, as appropriate.

GOALS:

1. Establish a Department-wide plan, with goals, to eliminate or reduce unnecessary acquisitions of hazardous substances or toxic chemicals.
2. Establish a Department-wide plan, with goals, to reduce DOE manufacture, process, and use of extremely hazardous substances and toxic chemicals.

Sub-objective 3.2

Integrate pollution prevention considerations when developing mission needs and when developing and revising acquisition documentation.

GOAL:

By August 3, 1995, review DOE standards and specifications to identify opportunities to eliminate or reduce unnecessary acquisitions of hazardous or toxic substances, and complete all necessary revisions by December 31, 1998.

OBJECTIVE 4: ACHIEVE EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW REPORTING

DOE OFFICES OF RESPONSIBILITY: All Cognizant Secretarial Offices

Sub-objective 4.1

Develop and maintain a comprehensive inventory of toxic chemicals, extremely hazardous substances, and hazardous chemicals at each DOE facility.

Sub-objective 4.2

Ensure that each facility fulfills all EPCRA reporting responsibilities, including:

- Emergency planning notification.
- All other information needed for local emergency planning.
- Chemical inventory information to local emergency planning committees.
- Emergency notification to local emergency response teams.
- TRI reporting.

OBJECTIVE 5: ADDRESS OTHER ENVIRONMENTAL QUALITY ISSUES AND POLLUTION PREVENTION FOCUS AREAS

Sub-objective 5.1

Address the requirements of Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," signed by the President on February 11, 1994. This Executive Order focuses on achieving environmental justice by promoting non-discrimination in DOE's programs that affect human health and the environment.

Sub-objective 5.2

Promote water conservation, energy efficiency, and use of renewable energy technologies, as required by Executive Order 12902, "Energy Efficiency and Water Conservation at Federal Facilities."

- Minimize life cycle costs by utilizing energy efficiency, water conservation, and renewable energy resources in the design and construction of new facilities, as well as in the modification of existing facilities.

GOALS:

1. By December 31, 2004, achieve a 30 percent Department-wide reduction in energy consumption from the 1985 baseline.
2. By December 31, 2004, increase Department-wide energy efficiency by at least 20 percent from the 1990 baseline.

Sub-objective 5.3

Optimize the use of environmentally preferable materials in the planning, construction, and maintenance of facilities. Establish and promote efficient material/energy-use practices through conservation, reutilization, materials substitution, recycling, affirmative procurement, and the creation of markets for recycled materials, as required by Executive Order 12873, "Federal Acquisition, Recycling, and Waste Prevention."

Sub-objective 5.4

Incorporate pollution prevention principles, techniques, and mechanisms into all planning and decision making processes. Evaluate and report those efforts in documentation required by the National Environmental Policy Act.

OBJECTIVE 6: DEVELOP, TRANSITION, AND APPLY INNOVATIVE POLLUTION PREVENTION TECHNOLOGIES

DOE OFFICES OF RESPONSIBILITY: All Cognizant Secretarial Offices

Sub-objective 6.1

Develop and support a DOE Strategic Plan to identify and prioritize research, development, demonstration, testing, and evaluation (RDDT&E) needs.

- Focus pollution prevention RDDT&E on developing and implementing critical technologies needed for source reduction.
- Encourage user participation in formulating requirements.

Sub-objective 6.2

Identify and fund high priority RDDT&E programs.

- Identify, develop, and implement a RDDT&E plan.

Sub-objective 6.3

Coordinate DOE's pollution prevention RDDT&E programs with those of other Federal agencies, academia, and private industry.

- Identify material and process substitutes in DOE technologies that have government-wide as well as commercial application for expedited implementation.
- Foster cooperative interagency, Federal-State, and government- industry partnerships to solve pollution prevention issues.
- Actively demonstrate and implement "off-the-shelf" technologies that ensure the mission capability of DOE facilities.
- Integrate pollution prevention measures into all appropriate operations.

Sub-objective 6.4

Encourage the development of strong domestic and foreign markets for DOE-developed, innovative pollution prevention technologies.

- Develop, demonstrate, test, evaluate, and implement innovative pollution prevention technologies at DOE facilities.
- Forge partnerships with environmental technology firms abroad to export DOE-developed pollution prevention technologies.

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